

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

EASTERN DIVISION

No. 05-10849RGS

HELEN RUNGE,

Plaintiff

v.

WALTER J. KELLY,
KERRY L. BLOOMINGDALE, M.D., and
SUNBRIDGE NURSING AND
REHABILITATION CENTER,

Defendants

**DEFENDANT WALTER J. KELLY'S MOTION TO EXTEND TIME TO
DISCLOSE EXPERTS RELATED TO PLAINTIFF'S CLAIMS AGAINST
DEFENDANTS SUNBRIDGE AND DR. BLOOMINGDALE**

NOW COMES the Defendant, Walter J. Kelly, and moves this honorable Court to allow Walter Kelly to disclose experts related to Plaintiff's claims against Sunbridge Nursing and Rehabilitation Center and Kerry L. Bloomingdale, M.D. By Court Order dated 2/2/07, Plaintiffs and Defendants have been granted an extension to disclose experts related to Plaintiff's claims against Defendants Sunbridge and Bloomingdale. Defendant Kelly now seeks the same extension. Defendants Sunbridge and Dr. Bloomingdale assent to this motion. In support of this motion, the Defendant submits the accompanying Memorandum of Law.

WHEREFORE, Defendant respectfully requests that this Honorable Court extend its Order of 2/2/07 and grant an extension to Defendant Kelly until April 1, 2007 to disclose experts related to Plaintiff's claims against Sunbridge and Dr. Bloomingdale.

Respectfully submitted,

The Defendant, Walter J. Kelly,

By his attorneys,

s/ Michele Carlucci

George C. Rockas, BBO #544009
Michele Carlucci, BBO #655211
WILSON ELSER MOSKOWITZ
EDELMAN & DICKER LLP
155 Federal Street
Boston, MA 02110
(617) 422-5400

LOCAL RULE 7.1 CERTIFICATION

I, Michele Carlucci, counsel for the Defendant, Walter J. Kelly, certify that I have spoken with counsel for Defendant Sunbridge and Defendant Dr. Bloomingdale, and both have given their assent to this motion. Plaintiff's counsel has not responded to our request for assent.

Dated: February 9, 2007

s/ Michele Carlucci

Michele Carlucci

CERTIFICATE OF SERVICE

I, Michele Carlucci, certify that on February 9, 2007 I have served a copy of the following by electronic filing and regular mail:

1. Defendant Walter J. Kelly's Motion to Extend Time to Disclose Experts Related to Plaintiff's Claims Against Sunbridge and Dr. Bloomingdale, and Memorandum in support thereof.

to all counsel of record:

James S. Hamrock, Esq.
Hamrock & Tocci
101 Main Street, 18th Floor
Cambridge, MA 02142

Blake J. Godbout, Esq.
Blake J. Godbout & Associates
33 Broad Street, 11th Floor
Boston, MA 02109

Glen R. Davis, Esq.
Latsha Davis Yohe & McKenna, P.C.
1700 Bent Creek Boulevard, Suite 140
Mechanicsburg, PA 17050

Robert J. Roughsedge, Esq.
Michael Williams, Esq.
Lawson & Weitzen, LLP
88 Black Falcon Avenue, Suite 345
Boston, MA 02210-2414

/s/ Michele Carlucci
Michele Carlucci